

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

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**STIPULATION FOR THE ENTRY OF AN ORDER ADJOURNING HEARING ON  
CITY OF DETROIT'S MOTION FOR (I) DETERMINATION THAT THE  
DETROIT POLICE LIEUTENANTS AND SERGEANTS ASSOCIATION HAS  
VIOLATED THE TERMS OF THE CITY OF DETROIT'S CONFIRMED  
PLAN OF ADJUSTMENT AND THE ORDER CONFIRMING IT; AND  
(II) ORDER (A) ENJOINING FURTHER VIOLATIONS AND (B) REQUIRING  
DISMISSAL OF STATE ACTIONS**

The City of Detroit, Michigan ("City") and the Detroit Police Lieutenants and Sergeants Association ("DPLSA"), by and through their undersigned counsel, hereby stipulate, agree and request that the court enter the order attached as Exhibit A, adjourning the hearing on City Of Detroit's Motion For (I) Determination That the Detroit Police Lieutenants and Sergeants Association Has Violated the Terms Of the City Of Detroit's Confirmed Plan Of Adjustment and the Order Confirming It; and (II) Order (A) Enjoining Further Violations and (B) Requiring Dismissal Of State Actions, currently scheduled for May 6, 2015 at 1:30 pm, to May 27, 2015 at 1:30 pm.

STIPULATED AND AGREED:

ATTORNEYS FOR THE CITY	ATTORNEYS FOR DETROIT POLICE LIEUTENANTS AND SERGEANTS ASSOCIATION
By: <u>/s/ Marc N. Swanson</u> Jonathan S. Green (P33140) Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 green@millercanfield.com swansonm@millercanfield.com	By: <u>/s/ Barbara A. Patek</u> Barbara A. Patek (P34666) ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C. 400 Galleria Officentre, Suite 444 Southfield, MI 48034 Telephone: (248) 827-4100 Facsimile: (248) 827-4106 bpatek@ermanteicher.com
-and-	-and-
Charles N. Raimi (P29746) Deputy Corporation Counsel City of Detroit Law Department 2 Woodward Avenue, Suite 500 Coleman A. Young Municipal Center Detroit, Michigan 48226 Telephone: (313) 237-5037 Facsimile: (313) 224-5505 raimic@detroitmi.gov	Peter P. Sudnick (P30768) SUDNICKLAW, P.C. 2555 Crooks Road, Suite 150 Troy, Michigan 48084 Telephone: (248) 643-8533 psudnick@sudnicklaw.com

DATED: April 17, 2015

**EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
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DETERMINATION THAT THE DETROIT POLICE LIEUTENANTS AND  
SERGEANTS ASSOCIATION HAS VIOLATED THE TERMS OF THE CITY OF  
DETROIT'S CONFIRMED PLAN OF ADJUSTMENT AND THE ORDER  
CONFIRMING IT; AND (II) ORDER (A) ENJOINING FURTHER VIOLATIONS AND  
(B) REQUIRING DISMISSAL OF STATE ACTIONS**

This matter having come before the Court on the Stipulation for the Entry of an Order Adjourning the Hearing on City Of Detroit's Motion For (I) Determination That the Detroit Police Lieutenants and Sergeants Association Has Violated the Terms Of the City Of Detroit's Confirmed Plan Of Adjustment and the Order Confirming It; and (II) Order (A) Enjoining Further Violations and (B) Requiring Dismissal Of State Actions ("Motion"); and the Court being fully advised in the premises;

IT IS ORDERED that the hearing on the Motion is adjourned from May 6, 2015 at 1:30 pm, to May 27, 2015 at 1:30 pm.